

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

PROJECT VERITAS ACTION FUND,

Plaintiff,

v.

C.A. No. 1:16-cv-10462-PBS

DANIEL F. CONLEY, in his official  
capacity as Suffolk County District  
Attorney,

Defendant.

**MOTION TO IMPOUND SELECT CONFIDENTIAL DISCOVERY MATERIAL**

Pursuant to Local Rule 7.2, Plaintiff seeks leave of the Court to impound certain Confidential Discovery Material that Defendant notified it would use in its forthcoming dispositive filings. Specifically:

- a. Material Related to Ongoing Litigation in *Wentz v. Project Veritas*, United States District Court, Middle District of Florida, 6:17-cv-01164-ORL-18GJK:
  - i. Deposition of Robert Joel Halderman, 242:17-243:19; 254-255; 256:13-16; 257:1-13.
  - ii. Submitted video file "Wentz/Teachers Union Prez" - "confidential - FNOE0239\_20150628192900.mp4"
- b. Material Related to Undercover Journalists Names or Confidential Information Concerning Veritas' Operations:
  - i. Redaction in Deposition of Russell Joseph Verney 75:12-18.
  - ii. Redaction in Deposition of Robert Joel Halderman 95:1-17.

6/12/18 Plaintiff shall submit the materials under seal for court review. Given B. Gave